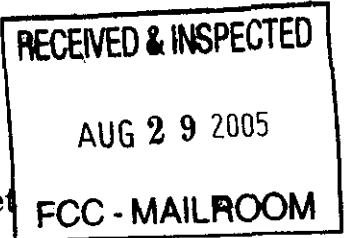


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August 22, 2005



Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: Proposed "Amendment of Part 97 of the Commission's Rules to Implement WRC-03 Regulations Applicable to Requirements for Operator Licenses in the Amateur Radio Service, WT Docket No. 05-235"

- § -

My Comment:

A portion of this Proposal is to *eliminate* the requirement of demonstrating the ability of sending and receiving International Morse Code at the rate of five words per minute.

I am **against** this portion of the Proposal:

1. Every licensee should *know* International Morse Code at this basic (5 wpm) level.
2. Morse code transmission (CW) is the most *efficient* method of communicating in the Amateur Service. One can reach the farthest distance with the minimum amount of transmitting power. The bandwidth required for CW is the smallest of all transmitting modes. In terms of avoiding waste and maximizing our resources, CW is the ultimate mode.
3. Over reliance on technology backfires when the technology *fails*. When technology fails, falling back on basics such as CW is sometimes the only mode that works. Remember the movie *Independence Day*? When all else failed only Amateur operators using CW saved the whole world! It may be only a movie, but the principle demonstrated is totally valid.
4. Morse code is *easy* to learn. I became a Boy Scout at age 11. A requirement for all Boy Scouts wanting to achieve the rank of First Class Scout was to demonstrate the ability to send and receive Morse code at 5 WPM. Every First Class Scout had to demonstrate Morse code at 5 WPM. If Morse code was too hard to learn, the Boy Scout movement would have ended many decades ago. I learned Morse code at about age 13. (Later, at age 16, I became an Eagle Scout.) When I earned a FCC Novice license in 1976, I already knew the code.
5. Historically, Morse code has been the *heart and core* of the Amateur Service. The ability of American men (and women) to serve in World War II was

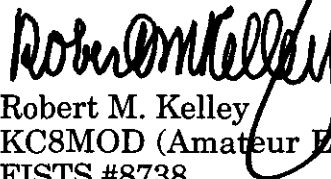
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greatly enhanced by the fact that many had already mastered Morse code in the Amateur Service. Morse code proficiency is a *national resource*. Don't kill a national resource!

6. Recently the US Naval Academy in Annapolis, MD, has *eliminated* the need for cadets to demonstrate proficiency with a sextant. Today cadets use GPS electronic gadgets to determine position. Big mistake. What will happen when an enemy destroys our GPS satellite system? (Or your battery fails?) Our Navy will be crippled: unable to determine position. In modern warfare, if you don't know where you are, you are in deep do-do! The FCC does *not* have to make the same mistake.

7. For many years the Morse code requirement has *not* caused hardship in the Amateur Service. "If it works, don't break it."

Sincerely,



Robert M. Kelley
KC8MOD (Amateur Extra)
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cc: FISTS CW Club
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